

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,**

Plaintiff,

v.

**MARK A. MILLER, SAEID
JABERIAN, and CHRISTOPHER J.
RAJKARAN,**

Defendants.

Case No. 21-CV-01445 (DSD/ECW)

**DECLARATION OF ALYSSA A. QUALLS IN SUPPORT OF PLAINTIFF
SEC'S MOTION FOR PARTIAL SUMMARY JUDGMENT
AGAINST DEFENDANT SAEID JABERIAN**

I, Alyssa A. Qualls, do hereby declare under penalty of perjury in accordance with 28 U.S.C. § 1746, that the following is true and correct, and further, that this declaration is made on my personal knowledge and that I am competent to testify as to the matters stated herein:

1. I am an attorney of record in these proceedings for Plaintiff United States Securities and Exchange Commission ("SEC").

2. Attached as Exhibit 1 to this declaration is a true and correct copy of the indictment against Defendants Mark A. Miller ("Miller"), Saied Jaberian ("Jaberian"), and Christopher J. Rajkaran in *United States v. Miller*, No. 0:21-cr-00142-DSD-ECW, Dkt. No. 1 (D. Minn.).

3. Attached as Exhibit 2 to this declaration is a true and correct copy of

Jaberian's Plea Agreement in *United States v. Miller*, No. 0:21-cr-00142-DSD-ECW, Dkt. No. 168 (D. Minn.).

4. Attached as Exhibit 3 to this declaration is a true and correct copy of Jaberian's Judgment of Conviction in *United States v. Miller*, No. 0:21-cr-00142-DSD-ECW, Dkt. No. 199 (D. Minn.).

5. Attached as Exhibit 4 to this declaration is a true and correct copy of a transcript excerpt of Jaberian's November 28, 2022 guilty plea in *United States v. Miller*, No. 0:21-cr-00142-DSD-ECW (D. Minn.).

6. Attached as Exhibit 5 to this declaration is a true and correct copy of a transcript of Jaberian's May 10, 2023 sentencing proceedings in *United States v. Miller*, No. 0:21-cr-00142-DSD-ECW (D. Minn.).

7. Attached as Exhibit 6 to this declaration is a true and correct copy of an excerpt of Jaberian's September 20, 2024 Deposition in this matter.

8. Attached as Exhibit 7 to this declaration is a true and correct copy of Miller's Plea Agreement in *United States v. Miller*, No. 0:21-cr-00142-DSD-ECW, Dkt. No. 238 (D. Minn.).

9. Attached as Exhibit 8 to this declaration is a true and correct copy of Miller's Judgment of Conviction in *United States v. Miller*, No. 0:21-cr-00142-DSD-ECW, Dkt. No. 210 (D. Minn.).

10. Attached as Exhibit 9 to this declaration is a true and correct copy of Miller's Amended Judgment of Conviction in *United States v. Miller*, No. 0:21-cr-00142-DSD-ECW, Dkt. No. 212 (D. Minn.).

11. Attached as Exhibit 10 to this declaration is a true and correct copy of Miller's Second Amended Judgment of Conviction in *United States v. Miller*, No. 0:21-cr-00142-DSD-ECW, Dkt. No. 229 (D. Minn.).

12. Attached as Exhibit 11 to this declaration is a true and correct copy of Miller's Third Amended Judgment of Conviction in *United States v. Miller*, No. 0:21-cr-00142-DSD-ECW, Dkt. No. 249 (D. Minn.).

13. Attached as Exhibit 12 to this declaration is a true and correct copy of an excerpt of Miller's September 19, 2024 Deposition in this matter.

Dated: February 21, 2025

Respectfully submitted,

/s/ Alyssa A. Qualls

Alyssa A. Qualls (QuallsA@sec.gov)

Senior Trial Counsel

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 21, 2025, I served the Declaration of Alyssa A. Qualls in Support of Plaintiff SEC's Motion for Partial Summary Judgment Against Defendant Saeid Jaberian upon the following as indicated below:

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/s/ Alyssa A. Qualls